

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ASHOT EGIAZARYAN	:	
	:	
	:	
v.	:	Case No. 1:11-cv-02670
	:	(PKC)GWG
	:	
PETER ZALMAYEV	:	
	:	

DECLARATION OF JAMES P. GOLDEN

JAMES P. GOLDEN hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a shareholder in the firm of Hamburg & Golden, P.C., counsel for defendant Peter Zalmayev, and I submit this declaration in support of Mr. Zalmayev's answer to Mr. Egiazaryan's motion for summary judgment and Mr. Zalmayev's cross motion for summary judgment.

2. The following true and correct exhibits are attached:

1. Complaint, with exhibits.
2. Answer and counterclaim.
3. Reply to counterclaim.
4. Amended complaint, without exhibits.
5. Zalmayev commentary.
6. Egiazaryan/BGR response to commentary.
7. February 6, 2011, Washington Post article.
8. November 23, 2009, Washington Times article.

9. March 9, 2011, Washington Post article.
10. May 27, 2011, Washington Post article.
11. Egiazaryan/BGR Wall Street Journal commentary, October 17, 2011.
12. February 18, 2011, BGR email.
13. BGR Proposal to Egiazaryan
14. Egiazaryan/Gibson Dunn-BGR public relations lobbying contract.
15. February 15, 2011, opinion in Egiazaryan Cyprus litigation.
16. Egiazaryan 1999 Duma application, translation, and declaration.
17. 2003 Elections Committee LDPR list, translation and declaration.
18. LDPR book excerpts and translation.
19. Interpol wanted notice for Egiazaryan.
20. March 14, 2011, email from Jason Motlagh to BGR, and BGR to Drew Holiner.
21. June 9, 2011, email from Nikolaus von Twickel to BGR, and BGR to Drew Holiner.
22. February 7, 2005, report of Duma vote.
23. Letter that is the subject of Duma vote reported on February 7, 2005.
24. August 4, 2011, email from John Lough to Ivo Ilic Gabara.
25. March 21, 2011, BGR/Drew Holiner email deleting Liberal Democratic Party of Russia affiliation on Egiazaryan Facebook page.
26. BGR memo Reflections on PR strategy.

27. BGR presentation Theft of Ashot Egiazaryan's Stake in the Moskva Hotel.
28. October 13, 2011, BGR emails and drafts of Egiazaryan Wall Street Journal commentary.
29. October 25, 2011, BGR email about writing Egiazaryan commentary.
30. October 06, 2011, Andrey Gloriozov declaration.
31. September 30, 2010, transcript of interrogation of Mikhail Borisovich Ananiev.
32. October 4, 2010, transcript of the interrogation of Alexey Vladimir Mironiuk.
33. Declaration of Peter Zalmayev.
34. Ashot Egiazaryan deposition transcript—January 18, 2012, not confidential.
35. Ashot Egiazaryan deposition transcript—January 19, 2012, not confidential.
36. Rinat Akhmetshin deposition transcript excerpts, March 20, 2012.
37. Peter Zalmayev deposition transcript excerpts, March 27 and 28, 2012.
38. Douglas Bloomfield deposition transcript excerpts, November 10, 2011.

/s/ James P. Golden
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Dated: June 3, 2013